

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROSE HANSEN, individually and on Behalf of all
others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

Civil Action No.: 1:08-cv-5320-NRB

TODD A. WRIGHT, Individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

Civil Action No.: 1:08-cv-5324-DC

DENISE A. TUTTLE, individually and on behalf of
all others similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

Civil Action No.: 1:08-cv-5578-DC

ROBERT M. COMINSKY, Individually and on
behalf of The Wachovia Savings Plan and all others
similarly situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

Civil Action No.: 1:08-cv-5990-UA

JASON T. WILLARD, On Behalf of Himself And
All Others Similarly Situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

Civil Action No.: 1:08-cv-6196-UA

MICHAEL WELCH, Individually And On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

WACHOVIA CORPORATION, ET AL.,

Defendants.

Civil Action No.: 1:08-cv-6464

**DECLARATION OF JEFFREY M. NORTON IN SUPPORT
OF PLAINTIFF'S MOTION FOR ENTRY OF PROPOSED
ORDER CONSOLIDATING THE ERISA ACTIONS
AND APPOINTING INTERIM LEAD COUNSEL**

I, Jeffrey M. Norton, declare the following under penalty of perjury:

1. I am a partner in the law firm of Harwood Feffer LLP and one of the attorneys of record for plaintiff Michael Welch (“Plaintiff”) and the proposed class members in the above-captioned action *Welch v. Wachovia Corporation, et al.*, Civil Action No.: 1:08-cv-6464.

2. I submit this declaration in further support of Plaintiff’s motion for consolidation of the above-captioned ERISA actions under the caption *In re Wachovia Corporation ERISA Litigation*, Master File No. 1:08-cv-532 (NRB) (the “Consolidated Action”) and for appointment of Harwood Feffer LLP as Interim Lead Counsel for the plaintiffs in the Consolidated Action.

3. Annexed hereto as Exhibit A is a true and accurate copy of Harwood Feffer LLP’s firm resume.

Dated: July 24, 2008

s/ Jeffrey M. Norton
Jeffrey M. Norton (JN-4827)
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